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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

REBECCA BRATCHER, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

ALLEGiant TRAVEL COMPANY and  
ALLEGiant AIR, LLC,

Defendants.

Case No.: 2:20-cv-00767-APG-BNW

**STIPULATION AND [PROPOSED] ORDER  
FOR 91-DAY EXTENSION OF ALL CASE  
DEADLINES**

**[THIRD REQUEST]**

1 Plaintiff Rebecca Bratcher (“Plaintiff”), by and through her undersigned counsel, and  
2 Defendants Allegiant Travel Company and Allegiant Air, LLC (“Defendants” or “Allegiant”)  
3 (Plaintiffs and Defendants are collectively referred to as the “Parties”), by and through  
4 Allegiant’s undersigned counsel, for good cause shown, hereby stipulate and agree to extend all  
5 outstanding deadlines in this case by ninety-one (91) days.<sup>1</sup>

6  
7 Good cause supports this joint request for a 91-day extension. Specifically, the Parties  
8 have been actively engaged in discovery. Plaintiff produced documents to Defendants on May  
9 14, 2021 and September 2, 2021. Likewise, Defendants produced documents to Plaintiff on June  
10 25, 2021, September 22, 2021, October 8, 2021, October 18, 2021, and October 25, 2021.  
11 Additionally, Defendants took Plaintiff’s deposition October 11, 2021. The Parties have been  
12 actively meeting and conferring regarding the various past and forthcoming productions, and  
13 require additional time such that a full production can be made. This case involves the search  
14 and production of voluminous ESI, the search of large databases, and the search of multiple  
15 custodians’ records. Further, the Parties are awaiting the production of documents requested  
16 under the Freedom of Information Act (“FOIA”). The Parties would like additional time to  
17 complete discovery, to prepare for and take depositions, and to have sufficient time to retain  
18 experts and prepare expert reports. Further, the Parties have conferred and agreed to attend a  
19 mediation and are presently discussing the scheduling and parameters of such mediation. While  
20 pursuing mediation, the Parties wish to conserve resources and minimize unnecessary expense.  
21 Under the current deadlines, the Parties will not have sufficient time to complete the mediation  
22 and, if the matter is unresolved, make the required production and fulsome disclosures.

23  
24 To provide the Parties with sufficient time to complete mediation and, if needed,  
25 complete and review all discovery thereafter, and schedule the appropriate depositions, the  
26 Parties have agreed to extend all outstanding deadlines in this case by an additional 91 days.

27  
28 

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<sup>1</sup> A 90-day extension causes almost all continued deadlines to fall on a Sunday. As such, the  
Parties propose a 91-day extension to simplify the new deadline calculations.

The updated case schedule would be as follows:

Event	Current Date	New Proposed Date
Expert Disclosure Deadline	January 26, 2022	April 27, 2022
Rebuttal Expert Disclosure Deadline	February 28, 2022	May 31, 2022 <sup>2</sup>
Expert Discovery Cutoff	March 14, 2022	June 13, 2022
Fact Discovery Cutoff	March 14, 2022	June 13, 2022
Dispositive Motion Deadline	March 14, 2022	June 13, 2022
Plaintiffs' Motion for Class Certification	March 14, 2022	June 13, 2022
Defendants' Opposition to Plaintiffs' Motion for Class Certification	May 16, 2022	August 15, 2022
Plaintiffs' Reply in Support of Motion for Class Certification/Disclosure of Rule 23 Rebuttal Reports	June 13, 2022	September 12, 2022
Pretrial Order Deadline	April 11, 2022	July 11, 2022

**IT IS SO STIPULATED.**

DATED: December 3, 2021.

Respectfully submitted,

**Order**

IT IS SO ORDERED

DATED: 10:49 am, December 06, 2021



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE

By: /s/ Don Springmeyer

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<sup>2</sup> May 30, 2022 (91 days) is Memorial Day.

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By: /s/ Jacob D. Bundick

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